

# Arent Fox

March 30, 2010

**Stanley H. Abramson**  
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VIA ELECTRONIC AND FIRST CLASS MAIL

Robert G. Perlis, Esq.  
Assistant General Counsel  
Office of General Counsel  
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USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Mr. Daniel Kenny  
Chief, Herbicide Branch  
Office of Pesticide Programs  
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USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: Withdrawal of Petitions to Deny Registrations of Agrilon International, LLC, Glysortia and Tide International USA, Inc. for Glyphosate Herbicides

Dear Messrs. Perlis and Kenny:

This firm represents Monsanto Company ("Monsanto") as the original registrant and the primary data submitter for the herbicide active ingredient glyphosate. In that capacity we have previously filed the following Petitions to Deny with your respective offices pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act and implementing Environmental Protection Agency regulations at 40 C.F.R. 152.99:

1. Glysortia, dated November 3, 2009 (delivered and signed for by Office of Pesticide Programs, Nov. 5, 2009, and Office of General Counsel, Nov. 6, 2009);
2. Tide International USA, Inc., dated November 3, 2009 (delivered and signed for by Office of Pesticide Programs, Nov. 5, 2009, and Office of General Counsel, Nov. 6, 2009);
3. Agrilon International, LLC, dated December 23, 2009 (delivered and signed for by Office of Pesticide Programs and Office of General Counsel, Dec. 31, 2009).

The above-cited Petitions are hereby withdrawn. If you have any questions, please contact the undersigned.

Arent Fox

Sincerely,

A handwritten signature in black ink, appearing to read 'Stanley H. Abramson', with a long horizontal line extending to the right.

Stanley H. Abramson  
Counsel for Monsanto Company

cc: Ms. Janelle Kay  
Pyxis Regulatory Consulting, Inc.  
4110 136 St. NW  
Gig Harbor, WA 98332